

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JANE DOE 1, *et al.*,
Plaintiffs,

v.

Baylor University,
Defendant.

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Civil Action No. 6:16-CV-00173-RP-AWA

Consolidated with
6:17-CV-228-RP-AWA
6:17-CV-236-RP-AWA

PLAINTIFFS' AND DEFENDANT'S JOINT ADVISORY AS TO ECF 929

TO THE HONORABLE JUDGE OF THIS COURT:

In response to the Court's inquiry in ECF 929, the parties conferred, but were unable to reach an agreement.

Plaintiffs' position is as follows:

- There are 2,500 documents dated prior to June 15, 2016, that are responsive to requests for production and that Baylor did not produce prior to the UnitedLex audit; and
- There are 5,569 documents dated prior to June 15, 2016, that are responsive to requests for production and that Baylor claims are privileged, but Baylor did not log prior to the UnitedLex audit.

Defendant's position is as follows:

- There are 1,114 documents dated prior to June 15, 2016, that are responsive to requests for production and that Baylor may not have produced prior to the UnitedLex audit ; and
- There are 857 documents dated prior to June 15, 2016, that are responsive to requests for production and that Baylor claims are privileged, but Baylor may not have logged prior to the UnitedLex audit.

The parties understand from ECF 929 that the Court does not desire additional briefing.

The parties are ready and willing to submit an explanation for how the parties arrived at their respective document numbers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing advisory was served upon all counsel of record on April 7, 2021, via the Court's ECF/CMF electronic service system as follows:

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